

BMP Element 3 — Critical Control Points City of Richmond Public Utilities – Wastewater Treatment				
Date of Last Review 11/08/16	Revision 15	Revised By Biosolids Team	Revision Date 11/08/16	Supersedes all previous versions
		Approved By Biosolids Supervisor	Approval Date 11/08/16	

Purpose

Critical control points must be properly managed to ensure biosolids meet applicable regulatory requirements and continue to maintain public acceptance, ensuring maximum beneficial use.

Scope

This element pertains to all management categories in the biosolids value chain and activities that impact the biosolids.

Responsible Staff

The Biosolids Supervisor, with support from the BMP Team, Utility Plant Superintendents I & II, and the Deputy Director II, is responsible for oversight of critical control points in the biosolids value chain. The hauling/land application contractor is responsible for truck loading, land application, site inspections, monitoring, communications, and permitting protocol procedures related to its activities. Utility Plant Operators are responsible for carrying out operational controls.

Procedures

1. Review and revision of the critical control points in the biosolids value chain are triggered by:
 - A. Changes in operational controls;
 - B. Changes in goals and objectives;
 - C. Changes in legal or other requirements;
 - D. Reconfiguration of equipment or installation of new equipment in the biosolids value chain; or

- E. Nonconformance or findings from internal or third-party audits.
2. Regardless of the conditions listed in procedure #1, a review of all critical control points is performed annually in conjunction with the annual review of goals and objectives. This review shall be performed no later than November.
 3. Changes to the critical control points are documented by the Biosolids Supervisor. If any significant operational changes occur that require a change to an identified critical control point or environmental impact associated with the critical control points, the Biosolids Supervisor will notify the assigned third-party auditor consistently with current NBP recognition and certification.
 4. The current list of critical control points is summarized in [Table 3.1](#). Critical control points have associated operational controls listed in the table. The appropriate work groups have standard operating procedures prescribing practices, monitoring, measurement, testing, and/or inspection methods used to ensure biosolids and biosolids activities meet or exceed all legal, quality, environmental protection, and public acceptance requirements.
 5. Operational controls provide methods and procedures to ensure uniform and efficient management at each critical control point. To show the relationship between operational controls and critical control points and to streamline documentation of information, Element 10 information is integrated with critical control points in Element 3 [Table 3.1](#)
 6. Potential environmental impacts for each critical control point are listed in [Table 3.1](#).